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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VALERIE SOTO; an individual,)
)
Plaintiff)
)
vs.)
)
INFINITY HOSPICE CARE, LLC;)
)
an Arizona limited liability company,)
NEVADA HOSPICE AND PALLIATIVE)
CARE, INC.; a Nevada corporation,)
INFINITY HOSPICE CARE OF LAS VEGAS,)
LLC, a Nevada limited liability company,)
INFINITY HOSPICE CARE OF RENO, LLC;)
a Nevada limited liability company,)
SWEET HOME BELMONT, LLC;)
a Nevada limited liability company,)
DOES I-X; ROE CORPORATIONS)
AND/OR ENTITIES I-X,)
)
Defendants.)
)

Case No. 2:22-cv-0632-BNW

**JOINT STIPULATION TO PERMIT PLAINTIFF ADDITIONAL TIME TO RESPOND
TO MOTION TO DISMISS FILED BY INFINITY DEFENDANTS**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of
Civil Practice 7-1, the parties (Plaintiff and Defendants Infinity Hospice Care, LLC, Infinity

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Hospice Care of Las Vegas, LLC, Infinity Hospice Care of Reno, LLC and Nevada Hospice and Palliative Care, Inc.) hereby stipulate, subject to the Court's approval, to permit Plaintiff additional time, to and until June 9, 2023, to respond to Defendants' motion to dismiss (ECF No. 40). Presently, Plaintiff's response to the motion to dismiss is due on May 25, 2023. This is Plaintiff's first request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. Undersigned counsel for Plaintiff has been ill during the past week and has not been able to devote the time needed to completing a response to the dispositive motion filed by Defendants. As a result, Plaintiff's counsel has been required to continue additional deadlines in other cases in order to permit sufficient time to meeting various case commitments while recuperating.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to and until June 9, 2023 is appropriate under the circumstances. The additional time will permit Plaintiff's counsel sufficient time to complete and file an appropriate response to the pending dispositive motion.

The parties respectfully request the Court approve this Stipulation.

Respectfully submitted,

/s/ Adam R. Knecht

/s/ Paul S. Padda

Adam R. Knecht, Esq.
 ALVERSON, TAYLOR & SANDERS
Counsel of Infinity Defendants

Paul S. Padda, Esq.
 PAUL PADDALAW
Counsel for Plaintiff

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 6/1/2023